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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ESTATE OF VALERIE YOUNG, et al.,

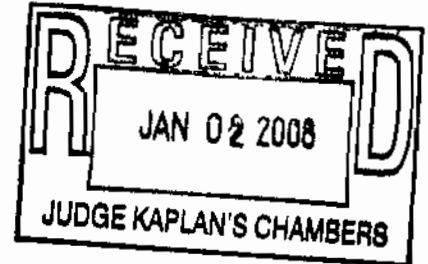
Case No.: 07-cv-06241 (LAK)

Plaintiffs,

against

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION & DEVELOPMENTAL SERVICES,
et al.,

defendants.



Stipulation and Amended Consent Scheduling Order

It is hereby stipulated and agreed between the parties, by their respective attorneys that the Scheduling Order be amended to accommodate the requirements of this matter, including the volume of documents involved and the need to obtain documents from non-party entities, by extending the deadlines by sixty days. There has been no prior request for an amendment of the Scheduling Order.

Wherefore, upon consent of the parties, it is hereby

ORDERED as follows:

1. No additional parties may be joined after February 18, 2008.
2. No amendment to the pleadings will be permitted after February 18, 2008.
3. The parties shall make required Rule 26(a)(2) disclosures with respect to:
 - (a) expert witnesses on or before March 31, 2008.
 - (b) rebuttal expert witnesses on or before April 14, 2008.
4. All discovery, including any depositions of experts, shall be completed on or before April 29, 2008.
5. A joint pretrial order in the form prescribed in Judge Kaplan's individual rules shall be filed on or before June 4, 2008.
6. No motion for summary judgment shall be served after the deadline fixed for submission of the pretrial order. The filing of a motion for summary judgment does not relieve the parties of the obligation to file the pretrial order on time.
7. If any party claims a right to trial by jury, proposed voir dire questions and jury instructions shall be filed with the joint pretrial order.

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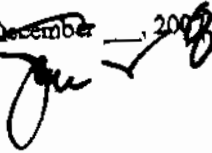
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8. Each party or group of parties aligned in interest shall submit not less than ten (10) days prior to trial (a) a trial brief setting forth a summary of its contentions and dealing with any legal and evidentiary problems anticipated at trial, and (b) any motions in limine.

9. This scheduling order may be altered or amended only on a showing of good cause not foreseeable at the date hereof. Counsel should not assume that extensions will be granted as a matter of routine.

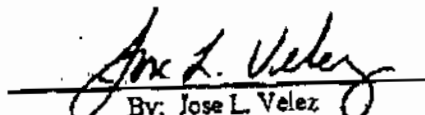
Dated: December 10, 2007


LEWIS A. KAPLAN
United States District Judge

Stipulated and agreed:

Catafago Law Firm, PC and
Jonathan Bauer, Esq.
Attorneys for Plaintiffs

Andrew Cuomo
Attorney General, State of New York
Office of the Attorney General
Attorneys for Defendants


By: Jonathan Bauer
By: Jose L. Velez
Assistant Attorney General

Dated: December 10, 2007

Dated: December 11, 2007